

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

Janice McMullen Jones

Complaint for a Civil Case

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. _____
(to be filled in by the Clerk's Office)

Jury Trial ☒ Yes ☒ No
(check one)

-against-

see attached

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

/, B. THE DEFENDANTS

Defendant No. 1

Diana Cherry

Pastor

From the Heart Church Ministry

4949 Allentown Road

Suitland, MD 20746

Prince George County

(301) 899-9411

Defendant No. 2

John Hagee

Pastor

Cornerstone Church

239 N. Loop 1604 W

San Antonio, TX 78232

Bexar County

(210) 494-3900

Defendant No. 3

Joel Osteen

Pastor

Lakewood Church

3700 Southwest Fwy.

Houston, TX 77027

Harris County

(713) 635-4154

Defendant No. 4

Noel Jones

Bishop

Noel Jones Ministries

14527 S. San Pedro Street

Gardenia, CA 90248

Los Angeles County

(310) 516-1433

Defendant No.5

Jimmy Swaggart

Pastor

Family Worship Center

8919 World Ministry Avenue, Ste B

Baton Rouge, LA 70810

Jimmy Swaggart County

(225) 768-8300

Defendant No. 6

Paul Morton

Bishop

Greater St Stephen Ministry

3350 Greenbriar Parkway SW

Atlanta, GA 30331

Fulton County

(404) 284-8865

Defendant No. 7

Jentzen Franklin

Pastor

Free Chapel

3001 McEver Road

Gainesville, GA 30504

Hall County

(678) 677-8300

Defendant No. 8

Greg Laurie

Pastor

Harvest Christian Fellowship

6115 Arlington Ave.

Riverside, CA 92504

Orange County

(949) 407-6770

Defendant No. 9
Claude Alexander, Jr
Bishop
The Park Church
6029 Beatties Ford Road
Charlotte, NC 28216
Mecklenburg County
(704) 392-1681

Defendant No. 10
Robert Morris
Pastor
Gateway Church
700 Blessed Way
Southlake, TX 76092
Tarrant County
(817) 552-5800

Defendant No. 11
Brian Houston
Pastor
Hillsong Church
1-5 Solent Circuit Baulkham Hills
New South Wales 2153
Wallace County
02 8853 5353

Defendant No. 12
Wayne Corderio
Pastor
New Hope Christian Fellowship Ministry
290 Sand Island Access Road
Honolulu, HI 96819
Hawaii County
(808) 885-5510

Defendant No. 13

Rick Joyner

Prophet

Morningstar Ministries

375 Starlight Drive

Fort Mill, SC 29715

York County

(800) 542-0278

Defendant No. 14

John Gray

Pastor

Relentless Church

635 Haywood Road

Greenville, SC 29607

Greenville County

(864) 281-1520

Defendant No. 15

Ron Carpenter

Pastor

Redemption Church

695 W. 19th Street

Costa Mesa, CA 92626

Orange County

(949) 607-8095

Defendant No. 16

T D Jakes

Bishop

The Potter's Touch

6777 Kist Blvd.

Dallas, TX 75236

Dallas County

(214) 331-0954

Defendant No. 17
Kenneth Hagin
RHEMA Bible Church
1025 W. Kenosha St.
Broken Arrow, OK 74012
Tulsa County
(918) 258-1588

Defendant No. 18
James Mc Donald
Harvest Bible Chapel
800 Rohlwing Rd.
Rolling Meadows, IL 60008
Cook County
(847) 398-7005

Defendant No. 19
Pastors Creflo and Taffi Dollar
World Changers Ministry International
2500 Burdett Rd
College Park, GA 30349
Fulton County
(770) 210-5700

Defendant No. 20
Debra Morton
Greater St Stephen Full Gospel
5600 Read Blvd
New Orleans, 70127
Orleans County
(504) 244-6800

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name
Street Address
City and County
State and Zip Code
Telephone Number

Janice McMullen Jones
977 Kingsbridge DR
ROCK HILL YORK
SC 29730
803-328-8120

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name
Job or Title
(if known)
Street Address
City and County
State and Zip Code
Telephone Number

See attached

Defendant No. 2

Name
Job or Title
(if known)
Street Address
City and County
State and Zip Code
Telephone Number

See attached

Defendant No. 3

Name

See attached

Job or Title _____
 (if known) _____
 Street Address _____
 City and County _____
 State and Zip Code _____
 Telephone Number _____
 Defendant No. 4
 Name See attached
 Job or Title _____
 (if known) _____
 Street Address _____
 City and County _____
 State and Zip Code _____
 Telephone Number _____

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Filing against Defendants #13 +
#14

Defendant #13 - discrimination/race, sex, age
 Defendant #14 - Discrimination/race, sex, age

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Janice McMullen Jones is a citizen of
the State of (name) SC.

b. If the plaintiff is a corporation

The plaintiff, (name) ~~Attached~~, is incorporated
under the laws of the State of (name) _____,
and has its principal place of business in the State of (name)
_____.

*(If more than one plaintiff is named in the complaint, attach an additional
page providing the same information for each additional plaintiff.)*

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) See attached 1-20, is a citizen of
the State of (name) _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) ~~Missing defendant 51-20~~,
incorporated under the laws of the State of (name) _____,
and has its principal place of
business in the State of (name) _____. Or is
incorporated under the laws of (foreign nation)
_____, and has its principal place of
business in (name) _____.

*(If more than one defendant is named in the complaint, attach an
additional page providing the same information for each additional
defendant.)*

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Fulton County
(770) 210-5700

Defendant No. 20
Deborah Morton
Greater St Stephen Full Gospel
5600 Read Blvd
New Orleans, 70127
(504) 244-6800

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Defendant 1-20

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Depending

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: _____

20

Signature of Plaintiff _____

Printed Name of Plaintiff _____

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

Telephone Number _____

E-mail Address _____